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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY -- NEWARK
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Chapter 13

In re:

Case No. 22-16619-VFP

Sean Lewis

Hearing Date: 10/6/22 @ 10:00 am.

Debtor

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**ATTORNEY'S RESPONSE TO TRUSTEE'S OBJECTION TO PROPOSED SALE OF
REAL PROPERTY LOCATED AT 110 MALLORY AVENUE, APT. 7, JERSEY CITY,
NJ 07304**

I, Nicholas Fitzgerald, the above named debtor's counsel, hereby certifies as follows:

1. I make this certification in response to the Chapter 13 trustee's objection to the debtor's motion to sell real property located at 110 Mallory Avenue, Apt. 7, Jersey city, NJ 07304 for a sale price of \$110,000.

2. We agree that the debtor must obtain a written valuation statement regarding the value of the property. We are in the process of getting that document.

3. The debtor has informed me that he is not going to retain a lawyer to represent him at the closing. The lawyer for

the seller is:

Linda J. Hockstein
Attorney at Law
660 Broadway
PO Box 1717
Bayonne, NJ 07002

(201) 823-1700 Office
(201) 437-5334 Fax

linda@hocksteinlaw.com

3. There is a real estate broker involved and we have now filed the appropriate paperwork to have that party retained.

4. Our proposed sale order already provides for the entire net proceeds of the sale to be paid to the Chapter 13 trustee.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 6, 2022



Nicholas Fitzgerald
Debtor's Counsel